

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALEXANDER MASHINSKY,

Defendant.

Case No. 23-cr-347 (JGK)

DEFENDANT’S MOTIONS IN LIMINE

Defendant Alexander Mashinsky respectfully moves pursuant to the Federal Rules of Evidence to: (1) allow into evidence the full video interviews; (2) prohibit the government from arguing or insinuating that “excess buying” of CEL is an illegal or wrongful act; (3) preclude improper summary charts and summary witness testimony; (4) permit the defense to introduce out-of-court communications for a non-hearsay purpose; (5) preclude the government from referring to or introducing any evidence relating to the Celsius bankruptcy; and (6) admit defense evidence responsive to the government’s theory that Mr. Mashinsky withdrew assets from Celsius because he knew it would fail.

WHEREFORE, for the foregoing reasons and those set forth in the accompanying Memorandum of Law, Declaration of Michael F. Westfal and the exhibits thereto, defendant Alexander Mashinsky respectfully requests that the Court grant these Motions *in Limine*.

Dated: New York, New York
October 11, 2024

Respectfully submitted,

MUKASEY YOUNG LLP

By: /s/ Michael F. Westfal
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CERTIFICATION OF SERVICE

I hereby certify that on October 11, 2024, a copy of the foregoing Motions *in Limine* was filed electronically. Notice of this filing will be sent by e-mail to all parties via the Court's electronic filing system.

Dated: New York, New York
October 11, 2024

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